

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT N. HARRINGTON, JR.)	CASE NUMBER 05-40115 FDS
Plaintiff,)	
)	
VS.)	
)	
JAMES M KREIDLER, JR. AND)	
THE TOWN OF WINCHENDON,)	
Defendants.)	

PLAINTIFF'S MOTION FOR THE COURT TO
CONDUCT A VOIR DIRE EXAMINATION OF THE JURY POOL

Now comes the Plaintiff, Robert N. Harrington, Jr., pursuant to Rule 47 of the Federal Rules of Civil Procedure and hereby requests that the Court ask the jury panel the following questions or, in the alternative allow Plaintiff's counsel to ask following questions of the jury pool:

1. Does anyone know any of the parties to this action or the attorneys representing the parties?
2. Has anyone served on a jury before?
3. Has anyone read anything in the newspaper about the Plaintiff, Robert Harrington?
4. Has anyone read anything in the newspaper about the Defendant, James Kreider?
5. Has anyone read anything about the dispute which is the subject of this lawsuit?
6. Does anyone or has any one lived in the Town of Winchendon?
7. Does anyone have a relative or acquaintance who lives or who lived in the Town of Winchendon?
8. Does anyone know any of the potential witnesses in this case?
9. Does or has anyone worked in the Town of Winchendon?

10. Does anyone have a relative or acquaintance who works or who worked in the Town of Winchendon?
11. Will you be able to decide this case solely on the evidence admitted at trial?
12. Do you have any bias or prejudice against people who bring lawsuits?
13. Do you have any personal convictions or fixed opinions that might make it difficult or prevent you from awarding fair and adequate damages to the Plaintiff if the evidence warrants it?
14. Has anyone ever fired anyone from a job?
15. Has anyone ever been a party to a civil lawsuit?
16. Has anyone ever been a witness in Court?
17. Has anyone ever been accused of discrimination or retaliation in the workplace?
18. Has anyone ever been accused harassment in the workplace?

The Plaintiff further requests that if any juror answers affirmatively to any of the preceding questions, that the juror be called to side bar and Counsel allowed to ask follow up questions of the juror to determine any potential bias against the parties.

WHEREFORE, the Plaintiff requests that the Court allow this motion and asked the preceding questions of the jury pool and allow Counsel for the Plaintiff to follow up, at side bar, with questions to any jurors that respond affirmatively to the above questions.

Respectfully Submitted,

The plaintiff,
By his attorney,

/s/ L. Richard LeClair, III
L. Richard LeClair, III, BBO#561650
LeClair & LeClair, P.C.
707 Main Street
Waltham, MA 02451
781-893-5655

Date: May 28, 2008